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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Geographic Partitioning
and Spectrum Disaggregation
by 900 MHz Specialized Mobile Radio
Service Major Trading Area Licensees

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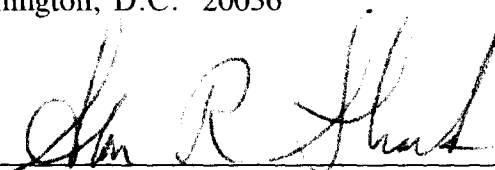
PETITION FOR RULEMAKING

Respectfully submitted,

**AMERICAN MOBILE TELECOMMUNICATIONS
ASSOCIATION, INC.**

1150 18th Street, N.W., Suite 250
Washington, D.C. 20036

By:



Alan R. Shark, President

Lukas, McGowan, Nace & Gutierrez, Chartered
1111 19th Street, N.W., Suite 1200
Washington, D.C. 20036
(202) 857-3500

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SUMMARY

The American Mobile Telecommunications Association, Inc. ("AMTA" or "Association") respectfully requests the initiation of a rule making proceeding to modify the 900 MHz SMR rules to expand the geographic partitioning provisions to include all 900 MHz MTA licenses and to permit spectrum disaggregation. AMTA believes that its proposal will facilitate the efficient use of 900 MHz spectrum by providing licensees with additional flexibility to tailor their business strategies, will increase competition by allowing market entry by new players, and will expedite the provision of this telecommunications option to areas that may not otherwise receive 900 MHz SMR or other wireless services in the near term.

Specifically, AMTA proposes that the 900 MHz SMR rules be amended to allow any MTA licensee to partition its license along established geopolitical boundaries any time after receiving an authorization without imposition of a holding period. Any party that meets the eligibility requirements to be a 900 MHz SMR licensee would be permitted to acquire an authorization for a partitioned geographic service area. Similarly, AMTA recommends that the 900 MHz rules be amended to allow any MTA licensee to assign any portion of its licensed spectrum any time after receiving an authorization. Licensees should be permitted to use both the partitioning and disaggregation rules in combination to enter or increase their presence in a market or to expand or enhance service offerings.

Consistent with the Commission's present construction requirements for rural telcos, AMTA proposes that an entity acquiring a partitioned area ("Partitionee") or disaggregated spectrum ("Disagregatee") be solely responsible for meeting the construction requirements in its area on its authorized frequencies. A Partitionee/Disagregatee acquiring its license within the first three years of the MTA license grant would be subject to the same construction requirement as any MTA licensee.

In the event a small or very small business-qualified MTA licensee seeks to partition or disaggregate some of its capacity, AMTA proposes that the FCC look to the Partitionee/Disagregatee for payment of the pro rata portion of any outstanding obligations to the Federal Treasury associated with the MTA license being partitioned or disaggregated. AMTA further proposes that the proportional value of the license would be determined by applying against the winning bid the percentage of the population in the geographic area partitioned or the percentage of the spectrum disaggregated.

AMTA recommends that Partitionee/Disagregatee receive a new call sign with an expiration date coterminous with the original MTA license. In addition, a Partitionee or Disagregatee would be granted a preference in a comparative renewal proceeding if it could demonstrate that it has provided "substantial" service to its partitioned area during its past license term and has complied substantially with applicable Commission rules, policies and the Communications Act.

Finally, for ease of administration, AMTA suggests that the Commission follow existing partial assignment procedures for 900 MHz SMR licensing in accepting any requests for geographic partitioning, disaggregation, or a combination of both.

The American Mobile Telecommunications Association, Inc. ("AMTA" or "Association"), pursuant to Section 1.401 of the Federal Communications Commission ("FCC" or "Commission") Rules and Regulations,^{1/} respectfully requests the initiation of a rule making proceeding to modify the 900 MHz Specialized Mobile Radio ("SMR") rules to expand the geographic partitioning provisions to include all 900 MHz MTA licenses and to permit spectrum disaggregation. AMTA believes that the proposals made herein will facilitate the efficient use of 900 MHz SMR spectrum by providing licensees with additional flexibility to tailor their business strategies, will increase competition by allowing market entry by new players, and will expedite the provision of this telecommunications option to areas that may not otherwise receive 900 MHz or other wireless services in the near term.

I. INTRODUCTION

1. AMTA is a nationwide, non-profit trade association dedicated to the interests of the specialized wireless communications industry.^{2/} The Association's members include trunked and conventional 800 MHz and 900 MHz SMR operators, licensees of wide-area SMR systems, and commercial licensees in the 220 MHz band. These members provide commercial wireless services throughout the country. Among AMTA's members are Phase I incumbent 900 MHz operators assigned licenses within Designated Filing Areas ("DFAs"); Phase II 900 MHz licensees holding authorizations for Major Trading Areas ("MTAs") issued pursuant to auction; and small operators interested in 900 MHz which were unable to secure capacity at the 900 MHz

^{1/} 47 C.F.R. § 1.401.

^{2/} These entities had been classified as private carriers prior to the 1993 amendments to the Communications Act. See Omnibus Budget Reconciliation Act of 1993, Pub. L. No. 103-66, Title VI § 6002 (b), 107 Stat. 312, 392 ("Budget Act").

SMR auction. Each of these existing and prospective 900 MHz service providers would benefit from a partitioning/disaggregation opportunity similar to that proposed by the FCC in the broadband Personal Communications Service ("PCS")^{3/} Thus, AMTA and its members have a significant interest in working with the FCC to adopt rules consistent with the proposals contained herein promptly.

II. BACKGROUND

2. In the 900 MHz Second Order on Reconsideration and Seventh Report and Order,^{4/} the Commission adopted a limited partitioning scheme whereby rural telephone companies ("rural telcos")^{5/} are permitted to acquire partitioned 900 MHz SMR licenses.^{6/} Rule Section 90.813 permits rural telcos to acquire a 900 MHz SMR license that is geographically partitioned from a separately licensed MTA, so long as the MTA applicant or licensee has voluntarily agreed (in writing) to partition a portion of the license to the entity.^{7/} The partitioned area must conform to established geopolitical boundaries, such as county lines; must include the wireline service area of the rural telco applicant; and must be reasonably related

^{3/} Notice of Proposed Rulemaking, WT Docket No. 96-148, 11 FCC Rcd ____ (rel. July 15, 1996)("PCS NPRM").

^{4/} Second Order on Reconsideration and Seventh Report and Order, PR Docket No. 89-553, 11 FCC Rcd 2639 (1995)("2nd Order on Reconsideration and 7th R&O").

^{5/} The Commission used the definition for rural telcos implemented in the Competitive Bidding Fifth Report and Order for broadband PCS. Fifth Report and Order, 9 FCC Rcd 5532 ¶¶ 15-152 (1994). Rural telcos are defined as local exchange carriers having 1000,000 or fewer access lines, including all affiliates.

^{6/} However, the FCC noted that it intended to explore whether to adopt a more general partitioning scheme in a future proceeding. 2nd Order on Reconsideration and 7th R&O at ¶ 179. The Commission has not initiated any such proceeding to date.

^{7/} 47 C.F.R. § 90.813(a).

to the rural telco's wireline service area.^{8/} The Commission further requires that each licensee in each partitioned area be responsible for meeting the build-out requirements in its area.^{9/}

3. These provisions are consistent with those established in the Competitive Bidding Fifth Report and Order for broadband PCS.^{10/} However, in a recent Notice of Proposed Rulemaking, the Commission proposed to modify the broadband PCS rules to expand the geographic partitioning provisions to include all qualified applicants and to permit spectrum disaggregation.^{11/}

4. According to the Commission, adoption of its proposal would be responsive to the Congressional mandate under Section 257 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996, to eliminate entry barriers into the telecommunications market for small businesses.^{12/} In addition, the FCC noted that the proposal is consistent with the directive of Section 309(j) of the Communications Act to promote economic opportunity for a wide variety of applicants including small business, rural telephone companies, and businesses owned by members of minority groups and women.

^{8/} Id. at 90.813(d).

^{9/} Id. at 90.813(e).

^{10/} Fifth Report and Order, PP Docket No. 93-253, 9 FCC Rcd 5532 ¶¶ 150-152 (1994).

^{11/} PCS NPRM. This is also consistent with the Commission's approach for 800 MHz SMR licensees where the FCC has proposed allowing an Economic Area ("EA") licensee to both disaggregate its spectrum and partition its geographic area. Second Further Notice of Proposed Rule Making, PR Docket No. 93-144, 11 FCC Rcd 1463 ¶¶ 259-268 (1995) ("800 MHz 2d NPRM").

^{12/} Telecommunications Act of 1996, Pub. L. No. 104-104, § 101, 110 Stat. 56 (1996); PCS NPRM at ¶ 1.

5. AMTA submits that modifying the 900 MHz SMR rules to make the geographic partitioning provisions available to all qualified applicants and to permit spectrum disaggregation also would be consistent with those Congressional directives and with the public interest. In addition, adoption of the rules proposed herein would likely increase the availability of capital that could be used to construct and maintain 900 MHz systems and would promote more rapid implementation of 900 MHz SMR systems in non-urban areas. For these reasons, AMTA proposes the following approach.

III. PARTITIONING

6. AMTA proposes that the 900 MHz rules be amended to allow any MTA licensee to partition its license any time after receiving an authorization without imposition of a holding period. Any party that meets the eligibility requirements to be a 900 MHz SMR licensee would be permitted to acquire an authorization for a partitioned geographic service area.^{13/}

7. As in the current rural telco rules at 900 MHz^{14/} and as proposed for the 800 MHz SMR service,^{15/} the partitioned area would be defined by established geopolitical boundaries, such as, but not limited to, county lines. Where the desired service area does not conform to existing geopolitical lines, parties would be free to seek a waiver of this requirement. MTA licensees would not be required to retain any particular percentage of the MTA authorization.

^{13/} Such parties would still be subject to the FCC's spectrum aggregation rules. See, 47 C.F.R. § 20.6.

^{14/} See, n.8.

^{15/} 800 MHz 2d FNPRM at ¶ 267.

IV. DISAGGREGATION

8. In the Third Report and Order, the Commission established blocks of ten contiguous channels for each of the twenty 900 MHz MTA licenses being auctioned.^{16/} The Commission explicitly stated that applicants could aggregate blocks of this spectrum to promote system and service flexibility options. AMTA submits that the dynamic wireless communications marketplace demands even greater regulatory flexibility in which MTA licensees are able to disaggregate, as well as aggregate, 900 MHz spectrum.

9. Similar to the rules proposed herein for partitioning, AMTA recommends that the 900 MHz rules be amended to allow any MTA licensee to assign portions of its licensed spectrum any time after receiving an authorization. No holding period would be imposed prior to permitting spectrum disaggregation. Any party that satisfies the eligibility requirements to be a 900 MHz SMR licensee could acquire a license for disaggregated spectrum.^{17/}

10. Disaggregation would encourage efficiency by providing licensees with a way to divest themselves of spectrum that may be more efficiently and profitably used by another entity or, conversely, to acquire additional increments of spectrum that their technology and customers may require. AMTA submits that setting a minimum amount of spectrum to be disaggregated at even one channel pair is too restrictive. Some services may not require paired frequencies.

^{16/} Third Report and Order, GN Docket No. 93-252, 9 FCC Rcd 7988 ¶ 116 (1994). This channelization was consistent with the authorizations previously issued to 900 MHz SMR licensees in designated filing areas.

^{17/} Such parties would still be subject to the FCC's spectrum aggregation rules. See, 47 C.F.R. § 20.6.

Therefore, AMTA proposes that to avoid inadvertent bias in favor of certain technologies, licensees should be allowed to disaggregate any portions of spectrum agreed to by the parties.

V. CONSTRUCTION REQUIREMENTS

11. Consistent with the Commission's present construction requirements for rural telcos,^{18/} AMTA proposes that an entity acquiring a partitioned area ("Partitionee") or disaggregated spectrum ("Disaggregatee") be solely responsible for meeting the construction requirements in its area on its authorized frequencies. Once a partitioned area or disaggregated spectrum transfer is approved by the Commission, the MTA licensee should have no rights in or responsibility for the partitioned area or disaggregated spectrum and the new licensee's rights would be independent from the MTA licensee's. Adopting a contrary policy would place the MTA licensee in the position of being accountable for compliance with regulatory requirements when it is powerless to ensure such compliance, because, by definition, it does not control the authorized capacity post-transfer.

12. 900 MHz MTA licensees have five years from the issuance of their authorizations within which to complete construction of their systems.^{19/} In the Second Erratum correcting Section 90.665(c), the FCC clarified that it had adopted two distinct options to satisfy this construction requirement.^{20/} Under the first option, an MTA licensee must construct and place into operation a sufficient number of base stations to provide coverage to at least 1/3 of the MTA population three years from the date of license grant, and demonstrate 2/3 coverage of the

^{18/} 47 C.F.R. § 90.813(e).

^{19/} 47 C.F.R. § 90.665(b).

^{20/} Second Erratum, PR Docket No. 89-553, DA 95-2327, 11 FCC Rcd ____ (rel. Nov. 8, 1995).

MTA population five years after license grant. The second option requires an MTA licensee to demonstrate five years after license grant that it is providing substantial service to the MTA. Thus, three years from initial license grant, the MTA licensee must either submit a showing that the 1/3 population coverage standard has been satisfied or provide written notification that it has elected to document substantial service to the MTA five years from license grant. If the MTA licensee chooses the substantial service showing, it must indicate how it expects to demonstrate substantial service at five years.

13. A Partitionee/Disaggregatee acquiring its license within the first three years of the MTA license grant would be subject to the same construction requirement as any MTA licensee. Specifically, the new licensee would be obligated three years after the original MTA license grant date to either submit a showing that service was provided on its authorized frequencies to 1/3 of the population within its licensed area or submit a written description of how it anticipates providing substantial service to the area five years from the MTA license grant date.

14. A Partitionee/Disaggregatee acquiring its license between three and five years after the MTA license grant would be acquiring its authorization from an MTA licensee which already had made its construction/coverage election. Accordingly, the new licensee would be required to satisfy a substantial service requirement for its area at five years if (i) the MTA licensee had met both its three-year and five-year coverage requirement for the entire MTA on all its licensed frequencies, or (ii) the MTA licensee had notified the FCC in writing at three years that it was electing to show substantial service at the five-year date. Of course, Partitionees and Disaggregatees acquiring authorizations after the five-year date would have no further construction obligations.

VI. UNJUST ENRICHMENT PROVISIONS

15. The Commission's unjust enrichment rules do not apply to post-auction transfers of spectrum held by entities that did not claim status as "small"^{21/} or "very small"^{22/} businesses. However, where the license involves installment financing or bidding credits, then the principles of the Commission's transfer restrictions and unjust enrichment rules should continue to apply. If the Partitionee/Disaggregatee does not qualify as a small or very small business, then no bidding credit or installment payment option would be extended to it. Instead, the new licensee would be required to reimburse the US Treasury for its pro rata amount of the bidding credit extended to the MTA licensee plus interest. The amount of this payment would be reduced over time consistent with the current unjust enrichment provisions.^{23/} The new licensee would also be obligated to make full payment on its pro rata portion of the MTA licensee's remaining unpaid principal and any unpaid interest accrued through the date of assignment or transfer as a condition of approval.^{24/}

16. In the event a small or very small business-qualified MTA licensee seeks to partition or disaggregate some of its capacity to a similarly qualified entity, AMTA proposes that

^{21/} An entity that together with its affiliates, persons or entities that hold attributable interests in such entity, and their affiliates, has average gross revenues that are not more than \$15 million for the preceding three years. 47 C.F.R. § 90.814(b)(1)(ii).

^{22/} An entity that together with its affiliates, persons or entities that hold attributable interests in such entity, and their affiliates, has average gross revenues that are not more than \$3 million for the preceding three years. 47 C.F.R. § 90.814(b)(1)(i).

^{23/} A transfer in the first two years would result in a forfeiture of 100 percent of the value of the pro rata bidding credit; in year three of the license term the payment would be 75 percent; in year four the payment would be 50 percent and in year five the payment would be 25 percent, after which there would be no assessment. See, 47 C.F.R. § 90.810(b)(1).

^{24/} See, 47 C.F.R. § 90.812(b).

the FCC look to the Partitionee/Disaggregatee for payment of the pro rata portion of any outstanding obligations to the Federal Treasury associated with the MTA license being partitioned or disaggregated, and offers two different options:

Alternative 1: The FCC would extend the same bidding credits^{25/} and installment payment^{26/} options to an eligible new licensee as it did to eligible small business MTA entities.^{27/}

Alternative 2: The Partitionee/Disaggregatee would pay the U.S. Treasury the full pro rata portion of the MTA licensee's outstanding obligation at the time of transfer. No installment payments would be available to the Partitionee/Disaggregatee, regardless of its size. However, an eligible new licensee would continue to enjoy bidding credits to offset the auctioned price of its license.

17. Under both scenarios, if the Partitionee or Disaggregatee defaults on its payment to the U.S. Treasury, the license for the partitioned area or disaggregated spectrum would revert

^{25/} The bidding credits under Part 90 allowed eligible very small businesses to receive a fifteen percent and small businesses to receive a ten percent payment discount for their winning bids. 47 C.F.R. § 90.810. These bidding credits were designed to put small businesses on equal footing with other larger applicants. 2nd Order on Reconsideration and 7th R&O at ¶ 165.

^{26/} Each licensee that qualifies as either a small or very small business may pay the remaining ninety percent of the net auction price for its license in quarterly installment payments over the term of the license. A very small business may make interest-only payments for five years and a small business may make interest-only payments for the first two years of the license term. Interest accrues at the Treasury note rate for very small businesses and at the Treasury note rate plus an additional 2.5 percent for small businesses. For the remaining years of the license term, payments include both principal and interest amortized over the term of the license. 47 C.F.R. § 90.812.

^{27/} Allowing installment payments reduces the amount of private financing needed by small business licensees, and thereby mitigates the effect of limited access to capital for small businesses, especially those owned by minorities and/or women.

back to the FCC.^{28/} The original MTA licensee ("Partitionor/Disaggregator") would have no obligation with respect to the payment, and no rights with respect to the area partitioned or spectrum disaggregated in the event of a default.

18. AMTA further proposes that the proportional value of the new license be determined by applying against the winning bid the percentage of the population in the geographic area partitioned or the percentage of the spectrum disaggregated. For example, if an MTA licensee assigned five of its ten frequencies, the value of the disaggregated license would be fifty percent of the MTA licensee's winning bid. The Disaggregatee would be responsible for paying that amount to the US Treasury, while the MTA licensee's balance owed would correspondingly be reduced by fifty percent.

VII. RELATED MATTERS

A. Combination of Partitioning and Disaggregation

19. AMTA recommends that licensees should be permitted to use both the partitioning and disaggregation rules in combination to enter or increase their presence in a market or to expand or enhance service offerings.

B. Licensing Process

1. License Term

20. 900 MHz MTA licensees currently are authorized for ten-year terms from the date of initial license grant.^{29/} Consistent with the approach adopted for MDS^{30/} and recently

^{28/} This is consistent with the Commission's installment payment rule which conditions an MTA license issued to an eligible small business that elects installment payments on the full and timely performance of the license holder's quarterly payments. 47 C.F.R. § 90.812(a).

^{29/} 47 C.F.R. § 90.665(a).

proposed for broadband PCS, AMTA proposes that Partitionee/Disaggregatee would receive a new call sign with an expiration date coterminous with the original MTA license. The Partitionee's license would list the geopolitical area to be included in the partitioned portion of the MTA, while the Disaggregatee's license would list the frequencies included in the spectrum disaggregated. The MTA license would be modified to delete the area partitioned or the frequencies disaggregated.

2. Renewal Expectancy

21. A 900 MHz MTA licensee may submit an application to renew its license for an additional license term, and is afforded a renewal expectancy if it can demonstrate that it has provided "substantial" service^{31/} during its past license term and has substantially complied with applicable FCC rules, policies and the Communications Act of 1934.^{32/} AMTA suggests that the Partitionee or Disaggregatee be afforded the same renewal expectancy. Specifically, a Partitionee or Disaggregatee would be granted a preference in a comparative renewal proceeding if it could demonstrate that it has provided "substantial" service to its partitioned area during its past license term and has complied substantially with applicable Commission rules, policies and the Communications Act.

^{30/} MDS Report and Order, 10 FCC Rcd at ¶ 46; 47 C.F.R. § 21.931.

^{31/} "Substantial" service is defined as service which is sound, favorable, and substantially above a level of mediocre service which just might minimally warrant renewal. 47 C.F.R. § 90.816(a)(1)(i).

^{32/} Third Order on Reconsideration, PR Docket No. 89-553, 11 FCC Rcd ____ (rel. Oct. 20, 1995).

3. Application Process

22. As proposed for PCS^{33/} and for ease of administration, AMTA suggests that the Commission follow partial assignment procedures for 900 MHz in accepting any requests for geographic partitioning, disaggregation, or a combination of both. Thus, the MTA licensee would file an FCC Form 490 that is signed by itself and by the Partitionee/Disaggregatee. The Partitionee/Disaggregatee would also submit an FCC Form 430 unless a current one is already on file with the Commission. An FCC Form 600 would be filed by the Partitionee/Disaggregatee applicant to receive authorization to operate in the market area which is being partitioned or on the frequencies being disaggregated. Any request for a partitioned license or disaggregated spectrum would contain the FCC Forms 490, 430, and 600 and be filed as one package under cover of the FCC Form 490.

VIII. CONCLUSION

23. AMTA believes that its proposals to permit partitioning and disaggregation in the manner described herein would allow 9000 MHz spectrum to be used most efficiently, speed service to unserved or underserved areas and facilitate competition. It also will eliminate entry barriers that might otherwise impede small businesses from competing effectively in the 900 MHz marketplace.

24. For the reasons described above, AMTA urges the Commission to adopt a Notice of Proposed Rule Making consistent with the recommendations herein at its earliest convenience.

^{33/} PCS NPRM at ¶ 60.

CERTIFICATE OF SERVICE

I, Linda J. Evans, a secretary in the law office of Lukas, McGowan, Nace & Gutierrez, hereby certify that I have, on this 30th day of September, 1996, caused to be hand delivered a copy of the foregoing Petition for Rulemaking to the following:

Chairman Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Commissioner James H. Quello
Federal Communications commission
1919 M Street, N.W., Room 802
Washington, D.C. 20054

Commissioner Rachelle B. Chong
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554

Commissioner Susan Ness
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20054

William E. Kennard, General Counsel
Office of the General Counsel
Federal Communications Commission
1919 M Street, N.W., Room 614
Washington, D.C. 20554

Michelle Farquhar, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, D.C. 20554

Gerald Vaughan, Deputy Chief
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, D.C. 20554

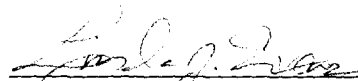
Rosalind K. Allen, Deputy Chief
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, D.C. 20554

Karen Gulick, Associate Bureau Chief
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, D.C. 20554

David Furth, Chief
Commercial Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 7002
Washington, D.C. 20554

Sandra Danner, Chief
Legal Branch
Commercial Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 7130-H
Washington, D.C. 20554

Terry L. Fishel, Chief
Land Mobile Branch
Division of Operations
Wireless Telecommunications Bureau
Federal Communications Commission
1270 Fairfield Road
Gettysburg, PA 17325


Linda J. Evans